

McQuain, Elise N.

From: Mark Troy x7519 <mtroy@forthepeople.com>
Sent: Wednesday, March 6, 2024 11:01 AM
To: Rivka Teitelbaum; McQuain, Elise N.; Kelli Lester x6799; Clancy Boylan x8507; Jeff Humphries x6187; Benjamin Adams x26474; Harter, William M.
Cc: Berwin Cohen; William Talbot; Jonathan Edderai
Subject: RE: *EXT* Dingess v. Sygma, et al.

Dear Counsel: As you know, we have decided, as counsel for Plaintiffs, that it would be best to take the depositions of the Defendants' 30(b) reps before we proceed with mediation. We also believe that it would make sense to complete these depositions before taking expert depositions, and we would certainly think that you would want to hold off on deposing our experts—at least our liability experts—until after the 30(b) depositions are complete to the extent that those depositions may impact our experts' opinions. Of course we have also filed a motion for leave to file a Third Amended Complaint which may not be ruled on by the Court for a few weeks. Given these realities and the time crunch imposed by our current Scheduling Order, we believe it makes sense to bump out some dates in our Scheduling Order and, in fact, obtain a new Scheduling Order which will allow us to wrap up discovery in a more fair and sensible manner. More specifically, we would propose the following, brief extensions:

Deadline	Date
1. Plaintiffs' Expert Disclosure:	May 1, 2024
2. Defendants' Expert Disclosure:	May 31, 2024
3. Rebuttal Expert Disclosure:	June 15, 2024
4. Discovery to Close:	July 31, 2024
5. Dispositive Motions Deadline:	August 15, 2024
6. Response to Dispositive Motions Deadline:	August 29, 2024
7. Reply to Response to Dispositive Motions:	September 12, 2024
8. Mediation Complete by:	August 15, 2024
9. Settlement Meeting:	August 23, 2024
10. Motions in Limine Deadline:	August 31, 2024
11. Responses for Motions in Limine:	September 7, 2024
12. Proposed Pretrial Order to Defendant	August 29, 2024
13. Integrated Pretrial Order:	September 5, 2024
14. Pretrial Conference:	Mid-September 2024 (TBD by Court)
15. Proposed Jury Charge:	1 Week After Pretrial Conf.
16. Final Settlement Conf.:	Mid-September 2024 (TBD by Court)
17. Trial:	Late-September to Early October (TBD by Court)

Please let us know if you are in agreement with this proposed new schedule and I will put something together for circulation. Thank you, Mark

Mark Troy
Attorney

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From: Rivka Teitelbaum <rivka@wolfferscohen.com>

Sent: Monday, March 4, 2024 5:05 PM

To: Mark Troy x7519 <mtroy@forthepeople.com>; McQuain, Elise N. <emcquain@fbtlaw.com>; Kelli Lester x6799 <KLester@forthepeople.com>; Clancy Boylan x8507 <cboylan@forthepeople.com>; Jeff Humphries x6187 <JHumphries@forthepeople.com>; Benjamin Adams x26474 <badams@forthepeople.com>; Harter, William M. <wharter@fbtlaw.com>

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Mark, thanks for speaking with me and Jonathan earlier. We'll await further clarity on the next steps here.

Best,
Rivka

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Rivka Teitelbaum | Associate



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